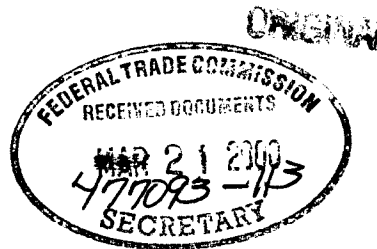




## HEILMAN & Associates, Inc.

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March 14, 2000

Secretary  
Federal Trade Commission  
Room H-159, 600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

**Re: Gramm-Leach-Bliley Act Privacy Rule, 16 CFR Part 313 - Comment**

**To Whom It May Concern:**

I am writing to express my concern with the proposed regulations to implement Title V of the Gramm-Leach-Bliley Act of 1999. As a licensed private investigator and small business owner, I fear that we would lose a valuable and very necessary source of locating witnesses and suspects, as well as gaining other pertinent information, if "non-public personal information" is defined to include simple names and addresses of customers of financial institutions.

It was my impression that the clear intent of Congress was to provide an opportunity for customers of financial institutions to "opt-out" of sharing their personal financial information with non-affiliates of the institutions. The statute provides protection for financial information – not mere names and addresses. If all information available to a financial institution is defined as "non-public personal information," then what is "public"? Congress seemed to be offering a distinction by describing financial information. I believe the Act provides opt-out of information regarding credit-history, employment and financial assets. However, a customer's name, address and phone number should not be classified as "non-public" information.

The importance of the role of private investigators in both our civil and criminal justice systems is not understood by many. The information that we are able to obtain with the access to addresses and phone numbers is essential to our conduct of business and fulfilling our obligations to our customers. We utilize this information to investigate embezzlement, insurance fraud, locate delinquent child support debtors and serve process among other things. For example, stalkers and scam artists seldom reside where their vehicles are registered, therefore, current address information is essential in order to assist in locating them. Law enforcement seldom has the manpower to develop these cases for prosecution, so our assistance is absolutely necessary to provide enough evidence to prove the case.

If this information is deemed "non-public personal," only wrongdoers and criminals will benefit and the law-abiding consumer will be the loser in the situation. I urge you to define non-public personal information in the manner that Congress intended.

Sincerely,  
HEILMAN & ASSOCIATES, INC.

M. Edward Heilman, CFE  
President

MEH/elb